

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:** August 5, 2003

ANGEL CASTILLO-BIENVENIDO, JR., : **VIOLATIONS: 21 U.S.C. § 846**
a/k/a "BX" : **(Conspiracy to distribute in**
MUSTAFA SHEIM SHERIFF, : **excess of 5 grams of cocaine**
a/k/a "Stafa" : **base ("crack") - 1 count)**
ANDRE KEYES : **21 U.S.C. § 841(a)(1)**
a/k/a "Drey" : **(Possession of cocaine base**
JASMINE MARIE LAWSON : **("crack") with the intent**
: **to distribute - 1 count)**
: **21 U.S.C. § 860(a)**
: **(Possession of cocaine base**
: **("crack") with the intent to**
: **distribute within 1000 feet of a**
: **school - 1 count)**
: **21 U.S.C. § 861(l)**
: **(Employing a juvenile to**
: **distribute cocaine base**
: **("crack") - 1 count)**
: **21 U.S.C. § 853**
: **(Criminal forfeiture)**
: **18 U.S.C. § 2**
: **(Aiding and abetting)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about April, 2003 through on or about June 5, 2003, at Reading,
in the Eastern District of Pennsylvania, and elsewhere, defendants

ANGEL CASTILLO-BIENVENIDO, JR.,
a/k/a "BX,"
MUSTAFA SHEIM SHERIFF,
a/k/a "Stafa"

ANDRE KEYES
a/k/a "Drey"
and
JASMINE MARIE LAWSON

did conspire and agree, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute in excess of 5 grams, that is, approximately 20 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

MANNER AND MEANS

It was a part of the conspiracy that:

2. From in or about April, 2003, to on or about June 5, 2003, defendants ANGEL CASTILLO-BIENVENIDO, JR., MUSTAFA SHEIM SHERIFF and ANDRE KEYES staffed, supervised, managed, controlled, and supplied 22 Orange Street, Reading, Pennsylvania with cocaine base ("crack") which the defendants and individuals employed by them sold to customers.

3. Defendants ANGEL CASTILLO-BIENVENIDO, JR., MUSTAFA SHEIM SHERIFF and ANDRE KEYES were responsible for distributing bundles of cocaine base ("crack"), consisting of 25 packets of cocaine base ("crack"), to others, who sold the crack cocaine to customers at 22 Orange Street.

4. Defendants ANGEL CASTILLO-BIENVENIDO, JR., MUSTAFA SHEIM SHERIFF and ANDRE KEYES employed various individuals as sellers of cocaine base ("crack") at 22 Orange Street.

5. Defendants ANGEL CASTILLO-BIENVENIDO, JR., MUSTAFA SHEIM SHERIFF and ANDRE KEYES used and carried firearms to protect 22 Orange Street and to prevent the theft of cocaine base ("crack") sold there.

6. Defendants ANGEL CASTILLO-BIENVENIDO, JR., MUSTAFA SHEIM SHERIFF and ANDRE KEYES paid workers, including JASMINE MARIE LAWSON, in cash from the proceeds of cocaine base ("crack") sales to customers to package bulk cocaine base ("crack") in packets for sale to customers.

7. Defendants ANGEL CASTILLO-BIENVENIDO, JR., MUSTAFA SHEIM SHERIFF and ANDRE KEYES paid workers in cash from the proceeds of cocaine base ("crack") sales \$50 per bundle of 30 \$10 packets they sold.

8. To protect the cocaine base ("crack") sales operation located at 22 Orange Street, Reading:

a. defendants ANGEL CASTILLO-BIENVENIDO, JR., MUSTAFA SHEIM SHERIFF and ANDRE KEYES carried and were in possession of firearms and bulletproof vests to protect themselves and their cocaine base ("crack") sales at that location; and

b. defendants ANGEL CASTILLO-BIENVENIDO, JR., MUSTAFA SHEIM SHERIFF and ANDRE KEYES often carried and used cellular phones, two-way radios and pagers to communicate with each other and other members of their organization.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the following overt acts, among others, were performed in Reading, in the Eastern District of Pennsylvania, and elsewhere:

1. In or about April, 2003, defendants ANGEL CASTILLO-BIENVENIDO, JR., MUSTAFA SHEIM SHERIFF and ANDRE KEYES established a cocaine base ("crack") distribution operation at 22 Orange Street in Reading, Pennsylvania.

2. On or about June 4, 2003, at the direction of defendants ANGEL CASTILLO-BIENVENIDO, JR., MUSTAFA SHEIM SHERIFF and ANDRE KEYES, Person #1, a 12 year old juvenile known to the grand jury, delivered two packets of cocaine base ("crack") to an undercover law enforcement officer at 22 Orange Street in Reading, Pennsylvania.

3. On or about June 5, 2003, defendant ANGEL CASTILLO-BIENVENIDO, JR. delivered approximately one ounce of cocaine base ("crack") to defendant JASMINE MARIE LAWSON to be packaged into packets for distribution at 22 Orange Street in Reading, Pennsylvania.

4. On or about June 5, 2003, defendant JASMINE MARIE LAWSON packaged a chunk of cocaine base ("crack") into packets which she gave to defendants ANGEL CASTILLO-BIENVENIDO, JR. and ANDRE KEYES for sale at 22 Orange Street in Reading, Pennsylvania.

5. On or about June 5, 2003, defendants ANGEL CASTILLO-BIENVENIDO, JR., MUSTAFA SHEIM SHERIFF and ANDRE KEYES possessed approximately 20 grams of cocaine base ("crack") for sale at 22 Orange Street in Reading, Pennsylvania.

6. On or about June 5, 2003, defendants ANGEL CASTILLO-BIENVENIDO, JR., MUSTAFA SHEIM SHERIFF and ANDRE KEYES:

a. possessed a Glock, 9 mm. semiautomatic pistol, serial number

CAG174US, fully loaded with 16 rounds, in furtherance of their drug trafficking activities at 22 Orange Street, Reading, Pennsylvania; and

b. possessed a bulletproof vest in furtherance of their drug trafficking activities at 22 Orange Street, Reading, Pennsylvania.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 5, 2003, at Reading, in the Eastern District of Pennsylvania, defendants

**ANGEL CASTILLO-BIENVENIDO, JR.,
a/k/a "BX,"
MUSTAFA SHEIM SHERIFF,
a/k/a "Stafa"
ANDRE KEYES
a/k/a "Drey"
and
JASMINE MARIE LAWSON**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, in excess of 5 grams, that is approximately 20 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 5, 2003, at Reading, in the Eastern District of Pennsylvania, defendant

**ANGEL CASTILLO-BIENVENIDO, JR.,
a/k/a "BX,"
MUSTAFA SHEIM SHERIFF,
a/k/a "Stafa"
ANDRE KEYES
a/k/a "Drey"
and
JASMINE MARIE LAWSON**

did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession with intent to distribute of, in excess of 5 grams, that is approximately 20 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Amanda E. Stoudt Elementary School located at 321 S. 10th Street, Reading and the Southern Middle School located at 931 Chestnut Street, Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 4, 2003, at Reading, in the Eastern District of Pennsylvania, defendant

**ANGEL CASTILLO-BIENVENIDO, JR.,
a/k/a "BX,"
MUSTAFA SHEIM SHERIFF,
a/k/a "Stafa"
and
ANDRE KEYES
a/k/a "Drey,"**

persons at least eighteen years of age, did knowingly and intentionally employ, hire, use, persuade, induce, entice, and coerce Person #1 known to the grand jury, and did aid and abet the knowing and intentional employment, hiring, use, persuasion, inducement, enticement, and coercion of Person #1, a person under eighteen years of age, to distribute a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 861(a)(1), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 21, United States Code, Sections 846, 841(a)(1), 860(a) and 861(a)(1), charged in this Indictment, defendants ANGEL CASTILLO-BIENVENIDO, JR., a/k/a "BX," MUSTAFA SHEIM SHERIFF, a/k/a "Stafa," ANDRE KEYES, a/k/a "Drey," and JASMINE MARIE LAWSON shall forfeit to the United States of America:

a. any property which constitutes or is derived from any proceeds obtained directly or indirectly by them in exchange for the distribution of a controlled substance, that is: cocaine base ("crack") and cocaine, Schedule II controlled substances.

b. any property which was used or intended to be used, in any manner or part, to commit or to facilitate the commission of the violations of Title 21, United States Code, Sections 846, 841(a)(1), 860(a) and 861(a)(1) charged in this Indictment.

SUBSTITUTE ASSETS

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of defendants ANGEL CASTILLO-BIENVENIDO, JR., a/k/a "BX," MUSTAFA SHEIM SHERIFF, a/k/a "Stafa," ANDRE KEYES, a/k/a "Drey," and JASMINE MARIE LAWSON

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All pursuant to Title 21, United States Code, Sections 853(a)(1), (2) and (p).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney